

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

The United States of America,

*Plaintiff*

v.

Madden Lai,

*Defendant*

Criminal No.:25-086 (BJM)

**MOTION TO CONTINUE**

TO THE HONORABLE COURT:

The Defendant, Madden Lai (Mr. Lai), represented by the Federal Public Defender for the District of Puerto Rico, informs, and prays the following:

1. A Preliminary Examination was set for February 18<sup>th</sup>, 2025, at 1:30pm before Magistrate Judge Bruce J. McGiverin.

2. Defense counsel, AFPD John Connors has discussed this case with AUSA Radzinski several times. These include a proposal to resolve the case by way of a plea to an information and a recommendation for a probationary sentence. Defense counsel has discussed this potential plea agreement with Mr. Lai who plans to accept it.

3. Mr. Lai needs to arrange transportation from Cabo Rojo. He cannot get transportation for the current court date of February 18, 2025, and is therefore seeking a

continuance of the preliminary hearing until February 20th or the following week of 2025.

He plans to enter a plea on that date. AUSA Radzinski has no objection to this request.

**THEREFORE**, it is respectfully requested that this Honorable Court take notice of the above and that the present motion be granted.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 13<sup>th</sup> day of February 2025.

**RACHEL BRILL**  
**Federal Public Defender**  
**District of Puerto Rico**

/s/ John J. Connors

John J. Connors  
Assistant Federal Public Defender  
241 F.D. Roosevelt Ave.  
Hato Rey, P.R. 009182441  
Tel (787) 2814922  
Email: john\_connors@fd.org